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December 7, 2021

**Via ECF**

Hon. Sanket J. Bulsara  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Northern Food I/E, Inc. v. OCM Globe Inc. et al.*,  
Case No. 1:21-cv-01813 MKB-SJB**

Dear Judge Bulsara:

Counsel for Plaintiff Northern Food I/E, Inc. and Defendants OCM Globe Inc., OCM Group USA Inc., OCM Group USA, NJ, Inc., Gang Wang, and Yaotian Li (collectively, “Defendants”) jointly submit this letter to respectfully request entry of the agreed Protective Order, submitted herewith.

The parties believe that changes to the Court’s standardized protective order are required due to the circumstances of the case. Accordingly, the agreed Protective Order contains two tiers of confidentiality, including a “Highly Confidential – Attorneys’ Eyes Only” designation. Pursuant to Your Honor’s Individual Practice and Rules, the proposed changes are shown in a track changes version of the agreed Protective Order, submitted herewith.

We thank the Court for its consideration of this request.

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Respectfully submitted,

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